

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

THE CHARTER OAK FIRE INSURANCE
COMPANY,

Plaintiff,

v.

Case No. 2:22-CV-00224-JPS

BERRADA PROPERTIES MANAGEMENT,
INC., and YOUSSEF BERRADA,

[JURY DEMAND REQUESTED]

Defendants.

**DEFENDANTS' NOTICE OF MOTION AND MOTION FOR JUDGMENT ON THE
PLEADINGS**

PLEASE TAKE NOTICE that Defendants Berrada Properties Management, Inc. and Youssef Berrada (collectively, "Defendants"), by and through their undersigned counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 12(c), for an order dismissing Plaintiff's Complaint.

The grounds for this Motion are set forth in Defendants' accompanying Brief in Support of Motion for Judgment on the Pleadings.

Certification Pursuant to Court's Pretrial Order (ECF No. 14): Counsel for Defendants, David G. Peterson, and Counsel for Plaintiff, Stacy A. Broman, met and conferred prior to Defendants filing this motion, in accordance with the Court's Pretrial Order (ECF No. 14). During that conference on July 12, 2022, the basis for this motion was discussed. Despite that conference, Plaintiff has not agreed to voluntarily dismiss this action, and as a result this motion is being filed. During that conference, the agreed Statement of Undisputed Facts filed herewith also was discussed and subsequently agreed upon by the parties.

Dated this 28th day of July, 2022.

Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202
Telephone: 414-298-1000
Facsimile: 414-298-8097

s/Danielle E. Marocchi
David G. Peterson
WI State Bar ID No. 1001047
dpeterson@reinhartlaw.com
Danielle E. Marocchi
WI State Bar ID No. 1103023
dmarocchi@reinhartlaw.com

Attorneys for Defendants